

**From:** Sarah Einselen <seinselen@gmail.com>  
**Sent:** Wednesday, July 14, 2021 3:42 PM  
**To:** Lamb, Scott <scottlamb@liberty.edu>  
**Subject:** [External] media request - from Roys Report

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Hi Scott, good to speak with you just now. As I told you I'm Sarah Einselen writing for The Roys Report, and I'm working on a story with some pretty serious allegations I'd like Liberty University to respond to.

Basically, several women are saying Liberty intentionally created a campus culture where sexual assaults and rapes were more likely to occur, and knew that was the case. The university did so, they say, by weaponizing the student honor code to make reporting sexual violence difficult or even impossible. They also say the university effectively condoned sexual violence, in particular by male student-athletes, and retaliated against women who reported being violated.

Several of the specific instances have been detailed publicly already, particularly in the third episode this season of the podcast "Gangster Capitalism." But in short: Some of the women say they reported being assaulted, but the university never informed them they could file a Title IX complaint. Others say they filed a Title IX complaint but an investigation wasn't launched or didn't include crucial evidence or testimony that was made available. Three women didn't report their assault or rape at all, largely because they feared the university would punish them for immorality under the student honor code or fail to take the case seriously. One is kind of an outlier in that she wasn't assaulted, but got pregnant; she says she was threatened with expulsion if she didn't marry her boyfriend immediately, which she then did, and then was barred from nursing or pumping on campus for several months. There's 10 women in all and their experiences cover about 15 years' time ending in 2020.

Can the university respond to these allegations? How has the university applied the student honor code in instances of sexual harassment and assault over the past 15 years? In particular, did the university ever apply the student honor code penalties for immorality to women who reported sexual violence, or threaten to do so?

I hope to hear from you soon. I'm on a tight deadline for this one so if you can get back with me as soon as possible that would be great. If I can clarify anything you can reach me by email or on my cell (number in signature).

Thanks,  
Sarah

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Sarah Einselen  
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[seinselen@gmail.com](mailto:seinselen@gmail.com)  
Award-winning journalist

**From:** Sarah Einselen <seinselen@gmail.com>  
**Sent:** Thursday, July 15, 2021 12:09 PM  
**To:** Lamb, Scott <scottlamb@liberty.edu>  
**Subject:** [External] Re: media request - from Roys Report

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I just found out that a man accused of sexual harassment by two of the women still works at Liberty. Keith Anderson is shown on Liberty's website as the executive director of the Student Health Center and Wellness Initiatives Department.

The two women were Liberty employees. The first was employed under Anderson in 2013, and she says he assaulted her in her home and followed up with weeks of retaliation in the workplace. The second says he made sexually explicit comments toward her repeatedly at work, also when he was her supervisor.

In both cases, the women say they made a complaint to HR, but neither complaint was sufficiently investigated and the Title IX office didn't get involved.

Can you address these allegations as well?

What Liberty policies exist to protect employees from sexual harassment in the workplace? How are those policies communicated to employees and supervisors?

Thanks,  
Sarah

On Wed, Jul 14, 2021 at 2:41 PM Sarah Einselen <seinselen@gmail.com> wrote:

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**From:** Sarah Einselen <seinselen@gmail.com>  
**Sent:** Thursday, July 15, 2021 12:21 PM  
**To:** Lamb, Scott <scottlamb@liberty.edu>  
**Subject:** Re: [External] Re: media request - from Roys Report

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To be honest I haven't listened to most of the Gangster Capitalism podcast so I can't say for sure. I learned of these allegations independently. I know at least one of the women was on the podcast but that's about all I can say for certain.  
Sarah

On Thu, Jul 15, 2021 at 11:12 AM Lamb, Scott <scottlamb@liberty.edu> wrote:

To clarify – it seems as though you are essentially asking us to comment on the allegations that the Gangster podcast put forth?

Help me see if that's not the case.

**Scott Lamb**  
*Senior Vice President of Communications and Public Engagement*

Cell (434) 262-2771  
Office (434) 592-6836

**LIBERTY**  
UNIVERSITY

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On Jul 15, 2021, at 12:09 PM, Sarah Einselen <seinselen@gmail.com> wrote:

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Lamb Rule 41  
Exhibit 14(c)

LU004345

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**From:** Mark Ebner <markebner59@gmail.com>  
**Sent:** Monday, July 19, 2021 2:13 PM  
**To:** Lamb, Scott <scottlamb@liberty.edu>  
**Subject:** Re: [External] Re: media request  
**Attach:** ATT00001.png; ATT00001.png

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Okay Scott, fine. I'll have them your way before the week is out.

On Mon, Jul 19, 2021, 10:50 AM Lamb, Scott <[scottlamb@liberty.edu](mailto:scottlamb@liberty.edu)> wrote:

I prefer that you send the question in writing.

-Scott

**Scott Lamb**  
*Senior Vice President of Communications and Public Engagement*

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On Jul 14, 2021, at 3:53 PM, Mark Ebner <[markebner59@gmail.com](mailto:markebner59@gmail.com)> wrote:

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Scott - Thanks again for the chat yesterday, and your care and attention given to my inquiry. On behalf of my co-author Mr. Granda, I'm preparing a question/topic sheet for you (and Liberty counsel). Would you like to set up a call in advance, on which I'd essentially interview you with counsel joining the call – or, would you prefer that I send the questions in writing for you to respond to in kind? Whatever works on your end. Let me know. Best, Mark Ebner - 310-738-0572

On Tue, Jul 13, 2021 at 9:23 AM Mark Ebner <[markebner59@gmail.com](mailto:markebner59@gmail.com)> wrote:

Mr. Lamb - Journalist/author Mark Ebner here, with a formal request to interview you for a nonfiction book I'm co-authoring for Harper Collins. I've left a message regarding the same with your campus voicemail. Find attached the Publishers Marketplace announcement of the project for which I'm reaching out to you specifically. - Mark Ebner - 310-738-0572.

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Suicide by media can take a lifetime.

**From:** Lamb, Scott </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9486496F07C9437183FC56652C82AB09-WSLAMB1>  
**Sent:** Thursday, July 15, 2021 8:46 AM  
**To:** Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nlhopkins@liberty.edu>  
**Subject:** RE: [External] media request - from Roys Report  
**Attach:** image001.png

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3:30 works!

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On Jul 15, 2021, at 8:44 AM, Nathan Lawrence Hopkins <nlhopkins@liberty.edu> wrote:

Scott,

Sorry, I forgot I'm judging moot court at the law school today. I forgot to put it on my calendar.

I could meet at 11:30 or 3:30 today. Or we could shoot for tomorrow.

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**From:** Lamb, Scott <scottlamb@liberty.edu>  
**Sent:** Wednesday, July 14, 2021 3:54 PM  
**To:** Hopkins, Nathan Lawrence (Office of Equity and Compliance) <nlhopkins@liberty.edu>  
**Subject:** Fwd: [External] media request - from Roys Report

Let's discuss tomorrow. Thanks

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Lamb Rule 41  
Exhibit 14(e)



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Lamb Rule 41  
Exhibit 14(f)

LU004780



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